

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,

v.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ETAL.

MOTION FOR DISCOVERY # IX

COMES NOW, THE PLAINTIFF JIMMIE LEWIS, PRO-SE
AND SUBMITS THIS MOTION FOR DISCOVERY, IN ACCORDANCE
TO THE HONORABLE JUDGE GREGORY M. SWEETS JULY 28, 06
COURT ORDER, IN ORDER TO OBTAIN THE TRUTH, THE WHOLE
TRUTH AND NOTHING BUT THE TRUTH IN THIS CIVIL MATTER,
AND ASSERTS THE FOLLOWING:



PD scanned

DATE : 12/11/06

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

- 1.) PROVIDE A PHOTOCOPY PRINTOUT OF THE D.P.C WORK SCHEDULE FOR THE FOLLOWING D.P.C EMPLOYEE'S, DATING FROM 5/21/04 THRU 6/25/04:
DR. CHARLOTTE SELIG, NA MICHAEL ERICKSEN,
RM KEN CREASEY, NURSE HELEN HANLON,
DIANE STACHOWSKI, FLORENCE SCOTT COBB,
DAVE SAXTON, CLARENCE OATES, CURTIS CORNISH,
WILLIAM EVANS, DR. KATHERINE SHENEMAN.
- 2.) DEFENDANTS MOFFETT AND GRAY WHO WERE THE ADDITIONAL STAFF MEMBERS WHOM SURROUNDED THE PLAINTIFF AND TOOK HIM TO THE FLOOR ON 6/14/04 AT OR ABOUT 9:00 PM.
- 3.) WHAT IS SAGERS ACCOUNT OF THE INCIDENT OF 6/14/04 AT OR ABOUT 9:00 PM, AS STATED IN THE PLAINTIFF'S COMPLAINT.
- 4.) DEFENDANTS MOFFETT AND GRAY, WHO WERE THE MEDICAL STAFF THAT ESCORTED THE PLAINTIFF TO THE SECLUSION ROOM ON 6/14/04 AT OR ABOUT 9:00 PM

- 5.) DEFENDANTS MORRETT AND GRAY WHO WERE THE MEDICAL STAFF WHOM HELP THE PERSON WHO INJECTED THE PLAINTIFF WITH PSYCHOTROPIC DRUGS ON 6/14/04 AT OR ABOUT 9:00 PM
- 6.) DEFENDANT JOHNSON WHO CALLED YOU TO COME TO THE MITCHELL BUILDING FOR ASSISTANCE ON 6/14/04 AT OR ABOUT 11:00 PM
- 7.) DEFENDANT JOHNSON WHOM WAS THE OTHER D.P.C STAFF MEMBER WHO ATTEMPTED TO CALM THE PLAINTIFF ON 6/14/04 AT OR ABOUT 11:00 PM
- 8.) DEFENDANT JOHNSON WHOM WERE THE OTHER STAFF THAT ESCORTED THE PLAINTIFF TO THE SECLUSION ROOM ON 6/14/04 AT OR ABOUT 11:00 PM.

9.) DR. SYLVIA FOSTER PROVIDE A PHOTOCOPY
PRINTOUT OF YOUR D.P.C WORK
SCHEDULE DATING FROM 5/21/04 THRU 6/25/04.

10.) IN REGARDS TO THE DEFENDANTS
JOHNSON, SABERS, MOFFETT AND GRAY'S
LIST OF WITNESSES, PROVIDE THE TIME,
DATES AND INCIDENT EACH NAME WITNESS,
DR. SELIG, MICHAEL ERICKSEN, KEN CREASEY,
HELEN HANLON, DIANE STACHOWSKI, DAVE SAXTON,
FLORENCE S. COBB, CLARENCE OATES,
CURTIS CORNISH, WILLIAM EVANS, DR. SHENEMAN,
INTEND TO PRESENT TESTIMONY REGARDING
THE PLAINTIFF'S COMPLAINT, IN ORDER TO
FACTUALLY DETERMINE WHICH WITNESS IS
IN POSSESSION OF RELEVANT EVIDENCE.

- 11.) HOW MANY NURSE ASSISTANTS WERE WORKING DURING THE 9:00 PM TO 11:00 PM HOURS OF 6/14/04 AT THE D.P.C, PROVIDE THE NAMES.
- 12.) PROVIDE THE WORK SCHEDULES FOR THE D.P.C EMPLOYEE'S WHOM WORKED ON 6/14/04
- 13.) DEFENDANTS, PROVIDE A COPY OF, OR A DISCRIPTION BY CATEGORY AND LOCATION OF, ALL DOCUMENTS, DATA COMPILATIONS AND TANGIBLE THINGS THAT ARE IN YOUR POSSESSION, CUSTODY, OR CONTROL THAT YOU MAY USE TO SUPPORT YOUR CLAIMS OF DEFENSE.
- 14.) PROVIDE A LIST OF WITNESS(ES), WHO ARE RETAINED OR SPECIALLY EMPLOYED TO PROVIDE EXPERT TESTIMONY IN THIS CASE OR WHOSE DUTIES AS AN EMPLOYEE AND OR CO-EMPLOYEE'S OF THE DEFENDANTS REGULARLY INVOLVE GIVING EXPERT TESTIMONY, PROVIDE ANY WRITTEN REPORT PREPARED AND SIGNED BY THE WITNESS(ES).

16.) DEFENDANTS, PROVIDE THE FULL ADDRESS OF RONALD STEVENS, AGE 20, WHO WAS AT THE D. P. C FROM THE DATES OF 5/21/04 THRU 6/25/04, FOR THE PURPOSE OF THE PLAINTIFF SUBPOENA HIM AS A WITNESS WHO WITNESSED THE INCIDENT NOTED IN THE PLAINTIFF'S COMPLAINT REGARDING DEFENDANT MOFFETT, SAGERS, AND GRAY ON 6/14/04 AT OR ABOUT 9:00 PM

17.) DEFENDANT MOFFETT, YOUR RESPONSE TO THE PLAINTIFFS MOTION FOR DISCOVERY V, # 1, IS COMBINED WITH DEFENDANT GRAY'S RESPONSE, FOR WHICH CAN MANIFEST A MISINTERPRETATION OF THE FACTS, DUE TO SAID RESPONSE NOT BEING DISTINGUISHED. MR. MOFFETT PROVIDE YOUR DISTINGUISHED INDIVIDUAL ACCOUNT OF THE INCIDENT NOTED IN THE PLAINTIFF'S COMPLAINT ON 6/14/04 AT OR ABOUT 9:00 PM.

18.) DEFENDANT GRAY, YOUR RESPONSE TO THE PLAINTIFF'S MOTION FOR DISCOVERY II, # 1, IS COMBINED WITH DEFENDANT MOFFETT'S RESPONSE, FOR WHICH CAN MANIFEST A MISINTERPRETATION OF THE FACTS, DUE TO SAID RESPONSE NOT BEING DISTINGUISHED. MR. GRAY PROVIDE YOUR DISTINGUISHED INDIVIDUAL ACCOUNT OF THE INCIDENT NOTED IN THE PLAINTIFF'S COMPLAINT ON 6/14/04 AT OR ABOUT 9:00 PM.

19.) ~~DEFENDANT~~ DEFENDANT SAGERS, WERE YOU PRESENT AT THE D.P.C ON 6/14/04, AT OR ABOUT 9:00 PM.

20.) DEFENDANTS, MOFFETT, GRAY AND SAGERS, IS HELEN HANLON THE D.P.C STAFF MEMBER WHO UTILIZED THE WALKIE TALKIE TO CALL FOR EMERGENCY ASSISTANCE, ~~WHEN MORNING~~. ON 6/14/04 AT OR ABOUT 9:00 PM YES OR NO?, IF NO WHO WAS THE D.P.C STAFF MEMBER WHO CALLED FOR EMERGENCY ASSISTANCE?

21.) PROVIDE THE JUNE 20, 04 GRIEVANCE DOCUMENT AND OR AFFIDAVIT THAT STATES THE GRIEVANCE WAS CLOSED AS UNSUBSTANTIATED, FOR DISCLOSURE OF THE FACT FINDING UTILIZED IN FORMING SAID DECISION REGARDING THE BASIS AND REASON THEREOF.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS PRO-SE
DUE HEREBY CERTIFY ON THIS 11TH, DAY OF DEC,
2006, THAT I DID MAIL BY U.S. POSTAL ONE TRUE AND
CORRECT COPY OF THE PLAINTIFF MOTION FOR DISCOVERY
IX, TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
J. CALEB BOGGS FEDERAL BUILDING
844 N. KING ST, LOCK BOX 18
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL.
WILMINGTON, DE 19801

CAROL ANTOFF ESQ
1001 JEFFERSON PLAZA, SUITE 202
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DATE: 12/11/06

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UNITED STATES DISTRICT COURT
844 N. KING ST, LOCK BOX 18
WILMINGTON, DELAWARE
19801

U.S.M.
X-RAY